**Annual Update
for the**

Nevada Test Site Site Treatment Plan

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April 1997

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**Waste Management
Division**

**U.S. Department of Energy
Nevada Operations Office**

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Table of Contents

1.0	Introduction	1
1.1	Purpose and Scope of the Draft Annual Update for the Nevada Test Site--Site Treatment Plan	1
1.2	Framework for Developing the Annual Update	1
2.0	STP-Covered Mixed Waste	2
2.1	PCB Soil	2
2.1.1	PCB Soil STP Interim Activity Dates and Milestones	2
2.1.2	PCB Soil FFCAct Consent Order Deadlines	3
2.2	Lead-Contaminated Soil	3
2.2.1	Lead-Contaminated Soil STP Interim Activity Dates and Milestones	4
2.2.2	Lead-Contaminated Soil FFCAct Consent Order Deadlines	4
2.3	Bulk Lead Waste	4
2.3.1	Bulk Lead Waste STP Interim Activity Dates and Milestones	5
2.3.1.1	STP Schedule for Processing Backlogged Waste: Spent Batteries	5
2.3.1.2	STP Schedule for Processing Backlogged Waste: T2 Lead Cylinders	6
2.3.2	Bulk Lead Waste FFCAct Consent Order Deadlines	6
2.3.2.1	FFCAct Consent Order Schedule for Processing Backlogged Waste: Spent Batteries	6
2.3.2.2	FFCAct Consent Order Schedule for Processing Backlogged Waste: T2 Lead Cylinders	6
2.4	Area 12 Solvent Sludge	6
2.4.1	Solvent Sludge STP Interim Activity Dates and Milestones	7
2.4.2	Solvent Sludge FFCAct Consent Order Deadlines	7
2.5	Shipping Cask	7
2.6	TTF Solvent	8
2.6.1	TTF Solvent STP Interim Activity Dates and Milestones	8
2.6.2	TTF Solvent FFCAct Consent Order Deadlines	8
2.7	Cotter Concentrate (Population A)	9
2.7.1	Cotter Concentrate (Population A) STP Interim Activity Dates and Milestones	9
2.7.2	Cotter Concentrate (Population A) FFCAct Consent Order Deadlines	10
2.8	Cotter Concentrate (Population B)	11
2.8.1	Cotter Concentrate (Population B) STP Interim Activity Dates and Milestones	11
2.8.2	Cotter Concentrate (Population B) FFCAct Consent Order Deadlines	12
2.9	Mixed Transuranic Waste	12
2.9.1	Mixed Transuranic Waste STP Interim Activity Dates and Milestones	13
2.9.2	Mixed Transuranic Waste FFCAct Consent Order Deadlines	13
3.0	Conclusion	13

1.0 Introduction

1.1 Purpose and Scope of the Annual Update for the Nevada Test Site--Site Treatment Plan

The U.S. Department of Energy, Nevada Operations Office (DOE/NV) is required by the Federal Facility Compliance Act (FFCAct) Consent Order negotiated between the Nevada Division of Environmental Protection (NDEP) and DOE/NV to submit a draft annual update of the *Nevada Test Site--Site Treatment Plan* (STP) to the NDEP for review and comment by January 15 of each year. DOE/NV is then required to finalize the draft update by April 30 of each year. In accordance with the FFCAct Consent Order, dated March 6, 1996, each Annual Update will bring the STP current to the end of the previous federal fiscal year. The Annual Update will provide a summary of the current status of DOE's progress in implementing the STP as required by the Consent Order, including proposed revisions, technology development, funding and other concerns that may affect the implementation of the STP.

The following are waste streams at the Nevada Test Site (NTS) that are discussed in the Annual Update.

- a. Polychlorinated Biphenyl (PCB) Soil
- b. Lead-Contaminated Soil
- c. Bulk Lead Waste
- d. Solvent Sludge (Area 12)
- e. Shipping Cask
- f. Treatability Test Facility (TTF) Solvent
- g. Cotter Concentrate (Population A)
- h. Cotter Concentrate (Population B)
- i. Mixed Transuranic Waste

The following are waste streams that were originally believed to be mixed waste streams requiring treatment, but are no longer mixed wastes. They were reported in the Background Volume of the STP for future reference. They are not included in the Annual Update.

- a. Pico Fluor
- b. Analytical Services Department Solvent
- c. Basic Environmental Compliance and Monitoring Program (BECAMP) Scintillation Vials
- d. BECAMP Scintillation Vial-Associated Waste

Information reported in the Annual Update for the mixed transuranic waste meets the annual reporting requirement set forth in the Settlement Agreement between the NDEP and DOE/NV.

1.2 Framework for Developing the Annual Update

The framework for developing the Annual Update generally follows the framework of the STP. Information reported in the STP is divided into two volumes. The Background Volume provides a detailed discussion of the preferred waste treatment option or options, identifies the waste stream the option addresses, and gives explanatory information for the Plan Volume. The Plan

Volume of the STP identifies the treatment methods selected and the schedules that have been negotiated for compliance with the FFCAct.

In accordance with the FFCAct Consent Order, the Annual Update to the Background Volume will quantify the amount of each covered waste remaining in storage at the NTS, and the volume treated, shipped off site or otherwise reduced in quantity during the previous fiscal year. The Annual Update to the Background Volume will also include any potential alternative commercial treatment, and off-site DOE treatment capacity or technology development being considered for potential plan revision.

The Annual Update to the Plan Volume requires a progress report from the end of the previous year, describing treatment progress and treatment technology development for each treatment facility and activity scheduled in the Plan Volume of the STP. The status of the interim activity dates and milestones listed in the Plan Volume for each waste stream, along with the deadlines listed in the FFCAct Consent Order, have been updated.

For clarity, the information required in both the Background and Plan Volumes to the Annual Update has been combined.

2.0 STP-Covered Mixed Waste

This section includes the current inventory of mixed waste covered under the STP and the FFCAct Consent Order and stored at the NTS.

2.1 PCB Soil

A 30-gallon container holding less than 0.05 cubic meters of PCB Soil is currently in storage on the Transuranic Waste Storage Pad (TRU Pad). Approximately three liters of waste, which constituted all of the soil portion of the waste stream, was shipped to the DOE Oak Ridge Toxic Substance Control Act (TSCA) Incinerator facility for analysis on November 19, 1996. The three-liter sample was analyzed and managed by the DOE Oak Ridge approved-laboratory, eliminating this portion of the waste stream.

The remaining portion of the PCB Soil waste stream consists of personal protective equipment and rags, which will be treated at the DOE Oak Ridge TSCA Incinerator. Treatment of this portion of the PCB Soil at the TSCA Incinerator is on schedule. DOE Oak Ridge has reviewed the waste application and provided comments. The application is currently being revised and will be resubmitted to DOE Oak Ridge for their approval prior to the June 30, 1997 deadline to receive written approval of acceptance.

2.1.1 PCB Soil STP Interim Activity Dates and Milestones

Complete All Additional Waste Characterization Required by Receiving Site's WAC (milestone)	December 31, 1996 COMPLETED: November 19, 1996
Receive Written Approval of Acceptance from Receiving Site (milestone)	June 30, 1997

If Waste Rejected, Initiate Revision Process
Detailed in NTS FFCAct CO (milestone)

July 31, 1997

Initiate Preparation of Waste for Shipment, if Approved
(milestone)

In accordance with receiving site
approved schedule

Complete Shipment of Waste (interim activity date)

Dependent upon outcome of negotiations
with appropriate parties

2.1.2 PCB Soil FFCAct Consent Order Deadlines

Complete All Additional Waste Characterization
Required by Receiving Site

December 31, 1996
COMPLETED: November 19, 1996

Receive Written Approval of Acceptance from
Receiving Site

June 30, 1997

If Waste Rejected, Initiate Revision Process

July 31, 1997

Initiate Waste Shipment

Deadline shall be in accordance with receiving
site approved schedule

2.2 Lead-Contaminated Soil

The lead-contaminated soil waste stream consists of soil contaminated with lead, radionuclides and barium, and soil contaminated with just lead and radionuclides. The soil contaminated with lead, radionuclides and barium consists of one 55-gallon drum of waste from the Area 27 Explosive Ordnance Disposal (EOD) Unit, which is currently stored on the TRU Pad.

The soil contaminated with lead and radionuclides consists of approximately 31.6 cubic meters of the lead-contaminated soil reported in the STP that were combined with the lead-contaminated soil from the Federal Facility Agreement Consent Order corrective action units (CAU) 08-26-02 and 25-26-15 now covered under the Mutual Consent Agreement. The lead and radionuclide-contaminated waste stream was stored on the TRU Pad in 17 containers.

In an attempt to remove the lead shot from the soil, the waste stream was screened for several weeks. The screening process was completed on August 22, 1996, and the waste was repackaged into fifteen B-25 boxes. A Toxicity Characteristic Leaching Procedure (TCLP) analysis was performed on the waste following screening to determine if it still exhibited the characteristic of toxicity due to the presence of lead. Of the fifteen B-25 boxes of waste, eight boxes passed TCLP for lead and are merely low-level waste. In a letter to DOE/NV dated March 18, 1997, NDEP concurred with DOE/NV's assertion that these eight boxes were no longer mixed waste and agreed to delete this portion of the waste stream from the FFCAct Consent Order.

Seven of the fifteen boxes have been verified as mixed waste with lead above the TCLP limits established by the Resource Conservation and Recovery Act (RCRA). Treatment at Envirocare had been the preferred option for treatment of this waste stream. However, the seven boxes of mixed waste contain lead shot, lead fines, and soil, which do not meet the waste acceptance

criteria for macroencapsulation at Envirocare. In addition, Envirocare's proposed stabilization facility is not yet available.

Although the waste volume has been reduced, a viable waste treatment method is currently not available for the remaining mixed waste. Stabilization at a RCRA-permitted off-site facility is currently being pursued for the soil contaminated with lead and radionuclides, and the Area 27 EOD Unit lead soil. A revision to the STP will be initiated in June 1997 if treatment has not been determined at that time.

2.2.1 Lead-Contaminated Soil STP Interim Activity Dates and Milestones

Complete Soil Screening and Initiate Sampling of Screened Soil (milestone)	September 30, 1996 COMPLETED: August 22, 1996
Complete All Additional Waste Characterization Required by Envirocare WAC (interim activity date)	April 1, 1997 CANCELED: Pursuing Alternate Treatment Options
Receive Written Approval of Acceptance from Envirocare (interim activity date)	May 30, 1997 CANCELED: Pursuing Alternate Treatment Options
Submit Schedule for Processing Backlogged Waste or Initiate Revision Process Detailed in NTS FFCAct CO (milestone)	July 31, 1997
Complete Shipment of Waste to Receiving Site (milestone)	September 30, 1997

2.2.2 Lead-Contaminated Soil FFCAct Consent Order Deadlines

Complete Soil Screening and Initiate Sampling of Screened Soil	September 30, 1996 COMPLETED: August 22, 1996
Submit Schedule for Processing Backlogged Waste or Initiate Revision Process	July 31, 1997
Complete Shipment of Waste to Receiving Site	September 30, 1997

2.3 Bulk Lead Waste

The bulk lead waste stream has been divided into three groups. Approximately twenty-nine percent of the bulk lead waste stream, including the DNA Lead Cylinders, the Junior Hot Cell Mesh, the Area 25 Test Cell C, and a portion of T2 Lead, was shipped off site to Envirocare on September 27, 1996, for treatment and disposal.¹ Fifty-three percent of the bulk lead waste includes the T2 lead cylinders which exceeded Envirocare's size constraint for macro-encapsulation. Reclamation of the T2 lead cylinders through the Scientific Ecology Group (SEG) in Tennessee is currently being pursued. The remaining 18 percent of the bulk lead waste stream

¹Envirocare will formally notify DOE/NV when treatment and disposal have been completed.

consisted of spent batteries. The spent batteries underwent sampling and analysis in November 1996 and were shipped to Envirocare on April 2, 1997, for treatment and disposal.

Of the bulk lead waste reported in the STP, only the T2 lead cylinders remain in storage at the NTS. DOE contends the T2 lead cylinders are recyclable scrap metal and requested their redesignation as such from NDEP. NDEP concurred with DOE's request to redesignate the FFCAct T2 lead cylinders in a letter from NDEP to DOE/NV dated April 10, 1997. As a condition of NDEP's concurrence, DOE/NV will continue to manage the T2 bulk lead waste as a mixed waste until SEG initiates shipping procedures.

The schedules for backlogged bulk lead waste, namely spent batteries and T2 lead cylinders, have been included in accordance with the STP and the FFCAct Consent Order. Of the schedules presented, all STP milestones and FFCAct Consent Order deadlines have been completed except for those associated with the T2 lead cylinders.

2.3.1 Bulk Lead Waste STP Interim Activity Dates and Milestones

Complete All Additional Waste Characterization Required by Receiving Facility (milestone)	June 30, 1996 COMPLETED: June 6, 1996
Initiate Preparation of Waste for Shipment, If Approved or Initiate Revision Process Detailed in the FFCAct CO (milestone)	September 30, 1996 COMPLETED: Waste Shipped September 27, 1996
Submit Schedule of Processing Backlogged Waste Based Upon Completion of Demonstration Project (milestone)	December 31, 1996 COMPLETED: December 31, 1996
Complete Shipment of Waste (interim activity date)	February 28, 1997 COMPLETED: September 27, 1996 ²

2.3.1.1 STP Schedule for Processing Backlogged Waste: Spent Batteries

Initiate Contract with Permitted Mixed Waste Treatment Facility to Treat Spent Batteries (milestone)	April 1, 1997 COMPLETED
Initiate Preparation of Spent Battery Shipment to Receiving Site After Formalizing Contract with Designated Waste Treatment Facility (milestone)	Within 60 Days of Successful Negotiation of Contract COMPLETED: April 2, 1997
Complete Spent Battery Shipment (milestone)	Within 30 Days of Initiating Preparation of Waste Shipment COMPLETED: April 2, 1997

²Refer to letter from DOE/NV to NDEP dated November 6, 1996, "FFCAct Site Treatment Plan Bulk Lead Status and Clarification."

2.3.1.2 STP Schedule for Processing Backlogged Waste: T2 Lead Cylinders

Initiate Contract with Designated Decontamination Facility for T2 Lead Reclamation (milestone)	Within 60 Days of NDEP Concurrence that Lead Cylinders can be Categorized as Recyclable Scrap Metal NDEP Concurrence: April 10, 1997 Milestone: June 9, 1997
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2.3.2 Bulk Lead Waste FFCAct Consent Order Deadlines

Complete All Additional Waste Characterization Required by Receiving Facility	June 30, 1996 COMPLETED: June 20, 1996
Initiate Preparation of Waste Shipment or Initiate Revision Process	September 30, 1996 COMPLETED: Waste Shipped September 27, 1996
Submit Schedule for Processing Backlogged Waste Based Upon Completion of Demonstration Project	December 31, 1996 COMPLETED: December 31, 1996

2.3.2.1 FFCAct Consent Order Schedule for Processing Backlogged Waste: Spent Batteries

Initiate Contract with Permitted Mixed Waste Treatment Facility to Treat Spent Batteries	April 1, 1997 COMPLETED
Initiate Preparation of Spent Battery Shipment to Receiving Site After Formalizing Contract with Designated Waste Treatment Facility	Within 60 Days of Successful Negotiation of Contract COMPLETED: April 2, 1997
Complete Spent Battery Shipment	Within 30 Days of Initiating Preparation of Waste Shipment COMPLETED: April 2, 1997

2.3.2.2 FFCAct Consent Order Schedule for Processing Backlogged Waste: T2 Lead Cylinders

Initiate Contract with Designated Decontamination Facility for T2 Lead Reclamation	Within 60 Days of NDEP Concurrence that Lead Cylinders can be Categorized as Recyclable Scrap Metal NDEP Concurrence: April 10, 1997 Milestone: June 9, 1997
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2.4 Area 12 Solvent Sludge

DOE has reviewed the radioactivity data for the solvent sludge waste stream against the NTS Performance Objective for Certification (POC) of Nonradioactive Hazardous Waste and has confirmed the radioactivity exhibited by the solvent sludge falls below the POC limits. As reported in a letter to NDEP from DOE/NV dated November 29, 1996, DOE/NV contends the Area 12 solvent sludge is hazardous waste without a radioactive component and, therefore, not

mixed waste. The NDEP concurred with DOE/NV's assertion in their written reply to DOE/NV dated January 13, 1997. In accordance with Part XI.3 of the FFCAct CO, the solvent sludge was moved to the Hazardous Waste Storage Pad on January 30, 1997, and will be shipped off site for disposal with the next hazardous waste shipment.

The waste stream also consisted of three 18x3 inch and one metal 4x6 inch filters. The analytical results for this waste have been reviewed and the waste has been determined to be hazardous waste and not mixed. While awaiting NDEP's formal concurrence and subsequent deletion of the filters from the FFCAct Consent Order, DOE/NV will continue to manage the solvent sludge filters on the TRU Pad as mixed waste in accordance with the following schedules.

2.4.1 Solvent Sludge STP Interim Activity Dates and Milestones

Complete All Additional Waste Characterization Required by Receiving Site's WAC (milestone)	December 31, 1996 COMPLETED: November 19, 1996
Receive Written Approval of Acceptance from Receiving Site (milestone)	June 30, 1997
If Waste Rejected, Initiate Revision Process Detailed in NTS FFCAct CO (milestone)	July 31, 1997
Initiate Preparation of Waste for Shipment, if Approved (milestone)	In accordance with receiving site approved schedule
Complete Shipment of Waste (interim activity date)	Dependent upon outcome of negotiations with appropriate

2.4.2 Solvent Sludge FFCAct Consent Order Deadlines

Complete All Additional Waste Characterization Required by Receiving Site	December 31, 1996 COMPLETED: November 19, 1996
Receive Written Approval of Acceptance from Receiving Site	June 30, 1997
If Waste Rejected, Initiate Revision Process	July 31, 1997
Initiate Waste Shipment	Deadline shall be in accordance with receiving site approved schedule

2.5 Shipping Cask

The shipping cask was disposed of on site in the Area 5 Radioactive Waste Management Site, Pit 3, on September 11, 1996, as documented in a letter from DOE/NV to the NDEP dated October 18, 1996. The NDEP concurred with DOE's request to delete this waste stream from the Plan Volume of the STP and the FFCAct Consent Order in a letter from NDEP to DOE dated

September 13, 1996. The shipping cask has been deleted from the STP and the FFCAct Consent Order in accordance with the terms and conditions detailed in Part XI, Deletion of Waste.

2.6 TTF Solvent

Approximately 0.1 cubic meter of the TTF waste is currently in storage on the TRU Pad. Samples of this waste were shipped on November 19, 1996, to the DOE Oak Ridge TSCA Incinerator facility for analysis. The results from this analysis indicate the D001 code should not apply to this waste; however, it still exhibits the characteristic of corrosivity and must continue to be managed as a mixed waste. Incineration at the DOE Oak Ridge TSCA Incinerator continues to be the preferred treatment option.

Treatment of the TTF waste stream at the DOE Oak Ridge TSCA Incinerator is on schedule. DOE Oak Ridge has reviewed the waste application and provided comments. The application is currently being revised and will be resubmitted to DOE Oak Ridge for their approval prior to the June 30, 1997-deadline to receive written approval of acceptance.

2.6.1 TTF Solvent STP Interim Activity Dates and Milestones

Complete All Additional Waste Characterization Required by Receiving Site's WAC (milestone)	December 31, 1996 COMPLETED: November 19, 1996
Receive Written Approval of Acceptance from Receiving Site (milestone)	June 30, 1997
If Waste Rejected, Initiate Revision Process Detailed in NTS FFCAct CO (milestone)	July 31, 1997
Initiate Preparation of Waste for Shipment, if Approved (milestone)	In accordance with receiving site approved schedule
Complete Shipment of Waste (interim activity date)	Dependent upon outcome of negotiations with appropriate parties

2.6.2 TTF Solvent FFCAct Consent Order Deadlines

Complete All Additional Waste Characterization Required by Receiving Site	December 31, 1996 COMPLETED: November 19, 1996
Receive Written Approval of Acceptance from Receiving Site	June 30, 1997
If Waste Rejected, Initiate Revision Process	July 31, 1997
Initiate Waste Shipment	Deadline shall be in accordance with receiving site approved schedule

2.7 Cotter Concentrate (Population A)

Approximately 260 cubic meters of Cotter Concentrate (Population A) are currently in storage at the NTS. Treatment at an on-site treatment facility was the option preferred to manage this material. DOE/NV has since determined that transferring Cotter Concentrate for additional uranium extraction by the uranium processing mill operated by Energy Fuels Nuclear, Inc. (EFN)³ instead of treating the waste on site will expedite treatment of Cotter Concentrate by two years and recycle approximately 260 cubic meters of material. This translates into a significant reduction in overall cost, resources, and worker exposure. Because EFN intends to reprocess the Cotter material for its intended purpose as concentrated uranium ore, DOE/NV contends this waste stream should be reclassified as alternate feed material and requested that NDEP delete it from the STP and the FFCAct Consent Order.

DOE/NV and NDEP agreed during the FFCAct FY 97 First Quarter Meeting held November 13, 1996, to hold the STP interim activity dates and milestones, and the FFCAct Consent Order deadlines for Cotter Concentrate (Population A) in abeyance to provide DOE/NV the opportunity to pursue treatment at EFN, and EFN to receive approval of their NRC license amendment to accept Cotter Concentrate. Accordingly, both parties agreed that fines and penalties associated with the Cotter Concentrate (Population A) deadlines would be held in abeyance. The STP and FFCAct Consent Order schedules have been modified to reflect this agreement.

In a letter from NDEP to DOE/NV dated January 13, 1997, NDEP concurred with DOE/NV's assertion to remove the F001 and F005 codes on the basis that the Cotter Concentrate is a process waste contaminated with solvents. While awaiting the approval of EFN's Nuclear Regulatory Commission (NRC) license amendment to accept the Cotter Concentrate as alternate feed, NDEP maintained the waste should continue to be managed as mixed waste in accordance with the FFCAct Consent Order because it is still a characteristic hazardous waste. The NDEP agreed that, upon receipt of documentation that the NRC license amendment has been approved, they would, under state authority, which includes federally delegated authority for these determinations, formally declare the Cotter Concentrate as a non RCRA-regulated material and available for release as feed material to EFN. Cotter Concentrate would then be deleted from the STP and the FFCAct Consent Order.

The NRC license amendment was approved on April 4, 1997. The alternate schedules listed herein will supersede the schedules currently held in abeyance, pending formal concurrence from NDEP. Cotter Concentrate (Population A) will be deleted from the FFCAct Consent Order once the request is formalized by NDEP.

2.7.1 Cotter Concentrate (Population A) STP Interim Activity Dates and Milestones

Provide Results of Treatability Study to the State of Nevada (milestone)	April 30, 1996 COMPLETED: April 29, 1996
Issue RFP for Pilot-Scale Study <u>or</u> Initiate Alternative Option (interim activity date)	June 30, 1996 COMPLETED -- RFP Issued for Study

³EFN is currently being restructured and will be renamed as the International Uranium (USA) Corporation when the restructuring process has been completed.

Award RFP (interim activity date)	August 31, 1996 HELD IN ABEYANCE
Initiate Pilot-Scale Study (interim activity date)	October 31, 1996 HELD IN ABEYANCE
Complete Pilot-Scale Study (interim activity date)	December 30, 1996 HELD IN ABEYANCE
Provide Treatment Results from Pilot-Scale Study to state of Nevada (milestone)	February 28, 1997 HELD IN ABEYANCE
If Pilot-Scale Study Successful. Submit Request to Modify RCRA Part B Permit to the state of Nevada or Initiate Revision Process Detailed In NTS FFCAct CO (milestone)	April 30, 1997 HELD IN ABEYANCE
State Approves Permit Modification (assumption)	At the discretion of the state of Nevada
Award Proposal. Assemble Treatment System, and Initiate Treatment System Testing (milestone)	Within 12 months of completion of successful system testing
Complete Successful System Testing, and Submit Schedule for Processing Backlogged Volumes of Cotter Concentrate (milestone)	Within 6 months of completion of previous milestone
Initiate Processing of Cotter Concentrate (interim activity date)	Within 3 months of completion of successful system testing
Complete Cotter Concentrate Processing (interim activity date)	Date will be provided upon submittal of schedule for processing backlogged waste.

Alternate Schedule: Cotter Concentrate (Population A) STP Interim Activity Dates and Milestones

Receive Approval of NRC License Amendment (interim activity date)	April 30, 1997 COMPLETED: April 4, 1997
Initiate Material Loading and Transport (milestone)	May 30, 1997
Complete Material Transport to EFN (milestone)	August 29, 1997

2.7.2 Cotter Concentrate (Population A) FFCAct Consent Order Deadlines

Provide Results of Treatability Study to State of Nevada	April 30, 1996 COMPLETED: April 29, 1996
Provide Treatment Results from Pilot Scale Study to state of Nevada	February 28, 1997 HELD IN ABEYANCE

Submit RCRA Part B Permit Modification or
Initiate Revision Process

April 30, 1997
HELD IN ABEYANCE

State Approves Permit Modification (assumption)

Award Proposal, Assemble Treatment System, and
Initiate Treatment System Testing

Within 12 months of permit issuance

Complete System Testing and Submit Backlogged
Waste Schedule

Deadline shall be established within
6 months of completion of Part VIII.8.c.

***Alternate Schedule: Cotter Concentrate (Population A) FFCAct Consent Order
Deadlines***

Initiate Material Loading and Transport

May 30, 1997

Complete Material Transport to EFN

August 29, 1997

2.8 Cotter Concentrate (Population B)

Approximately 1.4 cubic meters of Cotter Concentrate (Population B) are currently in storage at the NTS. Treatment at the DOE Oak Ridge TSCA Incinerator was the preferred treatment option for this waste stream. DOE/NV has since determined that Cotter Concentrate (Population B) should be reprocessed with Cotter Concentrate (Population A) at EFN. Cotter Concentrate (Population B) is being managed with Cotter Concentrate (Population A), as described in Section 2.7.

DOE/NV and NDEP agreed during the FFCAct FY 97 First Quarter Meeting held November 13, 1996, to hold the STP interim activity dates and milestones, and the FFCAct Consent Order deadlines for Cotter Concentrate (Population B) in abeyance to provide DOE/NV the opportunity to pursue treatment at EFN, and EFN to receive approval of their NRC license amendment to accept Cotter Concentrate. Accordingly, both parties agreed that fines and penalties associated with the Cotter Concentrate (Population B) deadlines would be held in abeyance. The STP and FFCAct Consent Order schedules have been modified to reflect this agreement.

The NRC license amendment was approved on April 4, 1997. The alternate schedules listed herein will supersede the schedules currently held in abeyance, pending formal concurrence from NDEP. Cotter Concentrate (Population B) will be deleted from the FFCAct Consent Order once a formal request is made by NDEP.

2.8.1 Cotter Concentrate (Population B) STP Interim Activity Dates and Milestones

Complete All Additional Waste Characterization
Required by Receiving Site's WAC
(milestone)

December 31, 1996
HELD IN ABEYANCE.

Receive Written Approval of Acceptance from
Receiving Site (milestone)

June 30, 1997
HELD IN ABEYANCE

If Waste Rejected, Initiate Revision Process (milestone)	July 31, 1997 HELD IN ABEYANCE
Initiate Preparation of Waste for Shipment, If Approved (milestone)	In accordance with receiving site approved schedule
Complete Shipment of Waste (interim activity date)	Dependent upon outcome of negotiations with appropriate parties.

Alternate Schedule: Cotter Concentrate (Population B) STP Interim Activity Dates and Milestones

Receive Approval of NRC License Amendment (interim activity date)	April 30, 1997 COMPLETED: April 4, 1997
Initiate Material Loading and Transport (milestone)	May 30, 1997
Complete Material Transport to EFN (milestone)	August 29, 1997

2.8.2 Cotter Concentrate (Population B) FFCAct Consent Order Deadlines

Complete All Additional Waste Characterization Required by Receiving Site's WAC	December 31, 1996 HELD IN ABEYANCE
Receive Written Approval of Acceptance from Receiving Site	June 30, 1997 HELD IN ABEYANCE
If Waste Rejected, Initiate Revision Process	July 31, 1997 HELD IN ABEYANCE
Initiate Waste Shipment	Deadline shall be in accordance with receiving site approved schedule.

Alternate Schedule: Cotter Concentrate (Population B) FFCAct Consent Order Deadlines

Initiate Material Loading and Transport	May 30, 1997
Complete Material Transport to EFN	August 29, 1997

2.9 Mixed Transuranic Waste

There are approximately 620 cubic meters of mixed transuranic waste currently stored on the TRU Pad. Management of the mixed transuranic waste at the NTS Waste Examination Facility (WEF) is on schedule. Construction and operation of the facility are covered under the NTS Environmental Impact Statement Record of Decision that was signed December 10, 1996. Phase I construction of the WEF has been completed, which included the construction of the building

foundation and the relocation of the building from Area 2 to Area 5. Work on Phase II, the building interior, began the week of February 23, 1997.

2.9.1 Mixed Transuranic Waste STP Interim Activity Dates and Milestones

Submit Work Plan to state of Nevada for TRU Waste Characterization Project (milestone)	February 29, 1996 COMPLETED: February 29, 1996
Complete Construction of Facility and Submit Processing Schedule (milestone)	June 30, 1997
Complete Pre-Characterization Activities Required by WIPP with all Required Information Submitted for Incorporation into the WIPP Waste Information System or Initiate Discussions with state of Nevada if WIPP Does Not Open (milestone)	June 1, 1998
Prepare a Plan to Ship MTRU to WIPP (interim activity date)	Within 12 months of decision to operate WIPP
Provide a Timetable for Submitting a Shipping Schedule (interim activity date)	Within 12 months of decision to operate WIPP

2.9.2 Mixed Transuranic Waste FFCAct Consent Order Deadlines

Submit a Work Plan to state of Nevada for TRU Waste Characterization Project	February 29, 1996 COMPLETED: February 29, 1996
Complete Construction of Facility and Submit Processing Schedule	June 30, 1997
Complete Pre-Characterization Activities Required by WIPP with all Required Information Having Been Submitted for Incorporation into the WIPP Waste Information System or Initiate Discussions with state of Nevada if WIPP Does Not Open	June 1, 1998

3.0 Conclusion

No STP milestones or FFCAct Consent Order deadlines have been missed for fiscal year 1996. The Shipping Cask, a portion of the solvent sludge waste stream, and eight B-25 boxes from the lead-contaminated soil waste stream have been deleted from the STP and the FFCAct Consent Order, in accordance with Part XI of the FFCAct Consent Order.

Completion and submittal of this Annual Update by April 30, 1997, to the NDEP meets the progress reporting requirements for this activity.